

U.S. Department of Justice

*United States Attorney  
Eastern District of New York*

F#2003R0300  
RWH:MH:DEW

*195 Montague Street  
Brooklyn, New York 11201*

*Mailing Address: 147 Pierrepont Street  
Brooklyn, New York 11201*

February 23, 2006

**By U.S. mail, ECF and Fax**

Mr. Bruce Cutler, Esq. and Ms. Bettina Schein, Esq.  
260 Madison Avenue  
20th Floor,  
New York, NY 10016

Mr. Edward Hayes, Esq and Ms. Rae Koshetz, Esq.  
515 Madison Avenue 30th floor  
NY, NY 10022

Re: United States v. Caracappa and Eppolito  
Criminal Docket No. 05-0192 (JBW)

Dear Counsel:

Pursuant to Giglio v. United States, the government discloses the following.

Alphonse D'Arco has been involved in the following categories of crimes: Murder, Murder conspiracy, extortion, narcotics trafficking, counterfeiting, burglaries, hijackings, armed robberies, arson, assaults, dealing in stolen stocks and bonds, tax evasion. The government has spent \$753,215.93 on relocation and security expenses for him and his family.

Peter Chiodo has been involved in the following categories of criminal activity, including conspiracies and attempts to commit these crimes: murder, attempted murder, loansharking, extortion, labor racketeering, assault, robbery and illegal gambling. The government has spent \$40,514.41 on relocation and security expenses for Mr. Chiodo.

Steven Corso has been involved in the following categories of criminal activity, including conspiracies and attempts to commit these crimes: wire fraud, embezzlement, and tax evasion. Corso has disclosed to the office that he used embezzled funds to finance his extensive gambling habit. In approximately 2002, the government froze Corso's assets in the course of an investigation into his embezzlement, leaving him with approximately \$600,000 in unpaid lines of credit at various

casinos in Las Vegas, Nevada, and approximately \$100,000 in unpaid expenses to American Express. Corso's embezzlement resulted in several lawsuits, which are pending. In addition, during the course of Corso's work with the Federal Bureau of Investigation, he was sued for stealing from Casa di Amore, which is pending. Corso failed to file timely income tax returns for 2002, 2003 and 2004. Corso filed returns for those years in approximately December 2005 after having been instructed to do so by the government.

Burton Kaplan has been involved in the following categories of criminal activity, including conspiracies and attempts to commit these crimes: murder, conspiracy to murder, kidnaping, obstruction of justice, passing counterfeit and/or stolen treasury bills and checks, money laundering, narcotics trafficking, interstate shipment and possession of stolen property, tax evasion, weapons possession, fraud, manufacture and sale of counterfeit clothing and violations of Bureau of Prisons rules to include smuggling contraband into a prison facility and assault on other inmates. The BOP violations were committed prior to his signing a cooperation agreement with the government.

As of February 1, 2006, the government has spent approximately \$14,684.46 on Kaplan, to cover relocation and security related costs.

The government will provide additional financial and other information on other witnesses pursuant to Gigliio v. United States within the next two days.

Very truly yours,

ROSLYNN R. MAUSKOPF  
United States Attorney  
Eastern District of New York

By: \_\_\_\_\_  
Robert W. Henoch  
Mitra Hormozi  
Daniel E. Wenner  
Assistant U. S. Attorneys

cc: Clerk of Court (JBW)